

### **Department of Energy**

Ohio Field Office Fernald Closure Project 175 Tri-County Parkway Springdale, Ohio 45246 DEC 13 2006



DOE-0093-07

Mr. Paul Pardi, RCRA Group Leader and FFCA Project ManagerOhio Environmental Protection Agency 401 East 5th StreetDayton, Ohio 45402-2911

Dear Mr. Pardi:

# SUBMITTAL OF CROSS-REFERENCE INDEX PURSUANT TO THE DIRECTOR'S FINAL FINDINGS AND ORDERS FILED JUNE 6, 1996

Reference:

Letter and Director's Final Findings and Orders (DF&O), Thomas E. Crepeau, Ohio EPA to Phil Hamric, U. S. DOE and John Bradburne, FERMCO, dated

June 6, 1996.

In accordance with Section V, Order #2 of the Director's Final Findings and Orders (Reference 1), attached is a cross-reference index of Hazardous Waste Management Unit (HWMU) closure components and CERCLA documents for those HWMUs identified in Attachment A of the DF&O. The index links specific components of Ohio Environmental Protection Agency's (OEPA) Closure Plan Review Guidance for RCRA Facilities related to substantive closure requirements with the appropriate CERCLA document which addresses those components. The list is cumulative and provides page numbers and sections for those CERCLA documents that have already been submitted.

Section V of the DF&O requires the Fernald Closure Project to provide an updated copy of the cross-reference table following the submittal of a referenced CERCLA document. The <u>Final Remedial Action Report for Operable Unit 3</u> was submitted to Ohio and U.S. EPA on December 7, 2006. The specific reference to this document in the cross-reference table has been highlighted.

If you have any questions regarding this matter, please contact Ed Skintik at (513) 246-1369.

Sincerely,

Johnny Reising

Director

Enclosure

cc: w/enclosure

F. Johnston

E. Skintik, DOE-FCP AR Coordinator

RCRA Operating Record

CLOSURE PLAN COMPONENT	GERCLA DOCUMENT	CROSS-REFERENCE INDEX
Description/Detailed Drawing of Waste	OU1 FINAL Remedial Investigation Report, August1994	Waste Pit 4 (27): Description, pp. 1-23 to 1-24; History, pp. 1-35 to 1-36;
Management Unit(s) to be Closed (Closure Guidance Item 3.2 and 3.4)	·	Drawings, pp. 1-83, 1-88
		Waste Pit 5 (42): Description, p. 1-24 to 1-27; History, pp. 1-36 to 1-37; Drawings, pp. 1-83, 1-89
	OU3 FINAL Integrated Remedial Design/Remedial Action Work Plan, May 1997	HWMU Component Number and Associated D&D complex: Table 3-10, p. 3-71
		D&D Complex Locations: Figure 2-2, p. 2-17
	OU3 Implementation Plans for Above-Grade Decontamination and Dismantlement	Drawing of HWMU:  To be submitted for Each D&D Complex
	FINAL Plant 1 Complex – Phase I Implementation Plan, March 1996	Plant 1 Storage Bldg. – Bldg. 67 (25): Figure D-11
	FINAL Thorium/Plant 9 Complex Implementation Plan, August 1997	Plant 9 Warehouse - Bldg. 81 (35): Figure D-10, D-11
	FINAL Misc. Small Structures Implementation Plan, October 1998	Waste Oil Decant Shelter (component of Trane Incinerator ) (28): No drawing available for this unit
		KC-2 Warehouse – Bldg. 63 (34): Figure D-22, D-23
		UNH Tanks – NFS Storage Area (46): Figure D-1
	FINAL Implementation Document for HWMUs #28 and #50, December 1998	Trane Incinerator (28): Attachment 1
		UNH Tanks – Raffinate Bldg. (50): Attachment 2
	FINAL Plant 6/East Warehouse Complex Implementation Plan, July 1999	Plant 6 Warehouse – Bldg. 79 (37): Appendix D
	FINAL Multi-Complex Implementation Plan, October 2001	NAR System (10), Box Furnace (14), Oxidation Furnace #1 (15), Plant 8 Warehouse - Building 80 (29), UNH Tanks - North of Plant 2 (47), UNH Tanks - Southeast of Plant 2 (48), UNH Tanks - Digestion Area (49):  Appendix D
	FINAL Laboratory Complex Implementation Plan, April 2002	Pilot Plant Warehouse - Bldg. 68 (33): Appendix D

CLOSURE PLAN COMPONENT	GERCLA DOCUMENT	CROSS-REFERENCE INDEX
Description/Detailed Drawing of Waste	FINAL Plant 1 Complex - Phase II Implementation Plan, August	CP Warehouse - Building 56 (19), TS-4, 5, and 6 (component of
Management Unit(s) to be Closed (Closure	2002	Plant 1 Pad) (20):
Guidance Item 3.2 and 3.4) - Continued		Appendix D
	OU5 FINAL Remedial Investigation Report, March 1995	General Location Map of HWMUs to be Closed Under CERCLA: Figure 4-112
		Size and Dimensions of HWMUs: Table 1-12
	*	FCP Topographic Map: Figure 3-1
		General HWMU Information and Locations Within OU5 Areas,
		Appendix D:
		Plant 1 Storage Pad (20):
		Plant 1 Area, Section D.2.1, p. D.2-2
		UNH Tanks (46-50), NAR System (10), Trane Incinerator (28): Plant 2/3 Area, Section D.2.2, p. D.2-19
		Storage Pad N of Plant 6 (36):
		Plant 6 Area, Section D.2.4, p. D.2-28
		Plant 8 East and West Drum Storage Pads (17, 18), Box
		Furnace (14), Oxidation Furnace #1 (15):
		Plant 8 Area, Section D.2.5, p. D.2-33
· ·	,	Sludge Drying Beds (41):
		Sewage Treatment Plant Area, Section D.2.7, p. D.2-41 Abandoned Sump West of Pilot Plant (22), Tank T-2 (54):
*		Pilot Plant Area Section D.2.8, p. D.2-45
		Drum Storage Area Near Lab Loading Dock (4), Drum Storage
		Area S of W-26 (5):
h h		Laboratory Area, Section D.2.9, p. D.2-51
		Tank Farm Sump (11):
		Tank Farm and Boiler House Area, Section D.2.13, p. D.2-
		69 Fire Training Facility (1):
		Fire Training Area, Section D.2.18, p. D.2-86
	+	1 110 11amming 7 110a, 000tton 512110, p. 512 00
List of Hazardous Waste(s) Managed in Unit(s)	OU1 FINAL Remedial Investigation Report, August 1994	Waste Managed in Unit:
(Closure Guidance Item 3.5)		Waste Pit 4 (27): pp. 4-60 to 4-70, pp. 1-35 to 1-36
		Waste Pit 5 (42): pp. 4-70 to 4-77, pp. 1-36 to 1-37
	OLIZ FINAL Remedial Investigation/Faceibility Study Report Fabruary	Wasta Managod in HWMI I:
	OU3 FINAL Remedial Investigation/Feasibility Study Report, February 1996	Waste Managed in HWMU: Table K-1
	1000	Table 14-1
	OU3 Implementation Plans for Above-Grade Decontamination and	Waste Managed in HWMU:
	Dismantlement	To be Submitted for Each D&D Complex
	FINAL PLANT OF THE PROPERTY OF	St. 14.01 BU ST. 27.27.
,	FINAL Plant 1 Complex – Phase I Implementation Plan, March	Plant 1 Storage Bldg. – Bldg. 67 (25): Section 3.7, p. 42
	1996	Section 3.7, μ. 42
	FINAL Thorium/Plant 9 Complex Implementation Plan, August	Plant 9 Warehouse - Bldg. 81 (35)
	1997	Section 3.13, pp. 39 to 40
	,	
		e e
	L	

	CERCLA DOCUMENT	CROSS-REFERENCE INDEX
CLOSURE PLAN COMPONENT     List of Hazardous Waste(s) Managed in Unit(s) (Closure Guidance Item 3.5) - Continued	FINAL Misc. Small Structures Implementation Plan, October 1998	Waste Oil Decant Shelter (component of Trane Incinerator) (28): Section 3.17, p. 36
		KC-2 Warehouse – Bldg. 63 (34) Section 3.23, pp. 41 to 43
		UNH Tanks – NFS Storage Area (46): Section 3.1, p. 23
	FINAL Implementation Document for HWMUs #28 and #50, December 1998	Trane Incinerator (28): HWMU Decontamination
		UNH Tanks – Raffinate Bldg. (50): HWMU Decontamination
	FINAL Plant 6/East Warehouse Complex Implementation Plan, July 1999	Plant 6 Warehouse – Bldg. 79 (37): Section 3.9, p 37
	FINAL Multi-Complex Implementation Plan, October 2001	NAR System (10): Section 3.1, pp. 40 to 41
		Box Furnace (14): Section 3.16, p. 76
		Oxidation Furnace #1 (15): Section 3.16, p. 77
		Plant 8 Warehouse - Bldg. 80 (29): Section 3.38, p. 108
		UNH Tanks - North of Plant 2 (47): Section 3.1, p. 42
		UNH Tanks - Southeast of Plant 2 (48): Section 3.23, p. 88
		UNH Tanks - Digestion Area (49): Section 3.1, p. 44
	FINAL Laboratory Complex Implementation Plan, April 2002	Pilot Plant Warehouse - Bldg. 68 (33): Section 3.4, pp. 36 to 37
	FINAL Plant 1 Complex - Phase II Implementation Plan, August 2002	CP Warehouse - Building 56 (19): Section 3.3, p. 35
		Plant 1 Pad Components (20): TS-4: Section 3.5, p. 39 TS-5: Section 3.6, p. 40
		TS-6: Section 3.7, p. 42

	CERCLA DOCUMENT	CROSS-REFERENCE INDEX
*CLOSURE PLAN COMPONENT		HWMUs with Potential Soil Contamination:
List of Hazardous Waste(s) Managed in	OU5 FINAL Integrated Remedial Investigation Report, March 1995	Tables 4-68 and 4-69
Unit(s) (Closure Guidance Item 3.5) -		1 ables 4-00 and 4-09
Continued	OUE FINIAL Faceibility Study Papert, June 1005	HWMU Constituents of Concern (COCs) for Soil:
·	OU5 FINAL Feasibility Study Report, June 1995	Tables 4-4, 4-5 and 4-6
		Tables 4 4, 4 5 and 4 5
· ·	OU5 FINAL Sitewide Excavation Plan, July 1998	HWMU COCs:
	OUS FINAL Sitewide Excavation Flan, July 1990	Table 2-1
<b>.</b>		1.0010 12 1
	OU5 Integrated Remedial Design Packages for Individual Remediation	
	Areas	
	Alcas	
	Area 1, Phase II Supplemental Characterization Package, April	Sludge Drying Beds (41):
	1999	Section 3.0, Disposition of Sludge Cake and Associated
		Debris, p. 3-1
	FINAL Implementation Plan for Area 3A/4A, May 2001	Storage Pad North of Plant 6 (36):
		Section 2.3.2.3, Location of HWMUs and USTs, p. 2-12
	FINAL Implementation Plan for Area 6 - Solid Waste Landfill and	Fire Training Facility (1):
*	Fire Training Facility, March 2003	Section 3.5, Identification of Area-Specific Constituents of
		Concern, pp. 3-9 to 3-10; Table 3-1, Preliminary Area-
	, ·	Specific Constituents of Concern
		Description of the second of t
	FINAL Implementation Plan for Area 3B/4B/5, February 2004	Drum Storage Area Near Lab Loading Dock (4), Drum Storage
		Area South of W-26 (5), Tank Farm Sump (11), Plant 8 East
		Pad (17), Plant 8 West Pad (18), Plant 1 Storage Pad (20),
		Abandoned Sump West of Pilot Plant (22):
		Table 2-4, p. 2-31
	Turk Turk Turk A County A Different Across Across	Masta Dit #4 (27):
	FINAL Excavation Plan for Area 6 Waste Pits and General Area,	Waste Pit #4 (27):
	October 2005	Section 1.2.4, Waste Pit 4, pp. 1-4 to 1-5
	8	M4- Dit 5 (40):
*		Waste Pit 5 (42):
		Section 1.2.5, Waste Pit 5, p. 1-5
	OUA FINAL Description Description Description Accord 4000	Removal of Waste – Waste Pit 4 (27), Waste Pit 5 (42):
3. Removal of Waste and Contaminated Media (Closure	OU1 FINAL Remedial Design Documents Package, August 1998	Volume 2, Excavation Plan
Guidance Item 3.6)		VOIGITIE Z, EXCAVATION FIAN
	OU3 FINAL Integrated Remedial Design/Remedial Action Work Plan,	General Methods for Removing and Storing Waste:
	May 1997	HWMU Decontamination, Section 3.2.3, p. 3-13; Materials
	Ividy 1997	Management, Section 3.3, pp. 3-30 to 3-63; HWMU
		Remediation (use of Safe Shutdown, D&D of complexes),
		Section 3.5.3, pp. 3-69 to 3-73
		, FP
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	1.	

CHOSURE PLAN COMPONENT	CERGLA DOCUMENT	CROSS-REFERENCE INDEX
Removal of Waste and Contaminated Media     (Closure Guidance Item 3.6) - Continued	OU3 Implementation Plans for Above-Grade Decontamination and Dismantlement	Removing Waste from HWMU Storage, Treatment, and Disposition of Waste:  To be Submitted for Each D&D Complex
	FINAL Plant 1 Complex – Phase Implementation Plan, March 1996	Plant 1 Storage Bldg. – Bldg. 67 (25): Section 3.7, p. 42
	FINAL Thorium/Plant 9 Complex Implementation Plan, August 1997	Plant 9 Warehouse – Bldg. 81 (35): Section 3.13, pp. 39 to 40
	FINAL Misc. Small Structures Implementation Plan, October 1998	Waste Oil Decant Shelter (component of Trane Incinerator) (28): Section 3.17, pp. 36 to 37
		KC-2 Warehouse – Bldg. 63 (34) Section 3.23, p. 42
		UNH Tanks – NFS Storage Area (46): Section 3.1, pp. 23 to 24
	FINAL Implementation Document for HWMUs #28 and #50, December 1998	Trane Incinerator (28): Remedial Tasks
		UNH Tanks – Raffinate Bldg. (50): Remedial Tasks, HWMU Decontamination
	FINAL Plant 6/East Warehouse Complex Implementation Plan, July 1999	Plant 6 Warehouse – Bldg. 79 (37): Section 3.9, p. 37
	FINAL Multi-Complex Implementation Plan, October 2001	NAR System (10): Section 3.1, pp. 41 to 42
	š.	Box Furnace (14): Section 3.16, p. 76
		Oxidation Furnace #1 (15): Section 3.16, pp. 77 to 78
		Plant 8 Warehouse - Bldg. 80 (29): Section 3.38, pp. 108 to 109
		UNH Tanks - North of Plant 2 (47): Section 3.1, pp. 42 to 43
		UNH Tanks - Southeast of Plant 2 (48): Section 3.23, p. 88
		UNH Tanks - Digestion Area (49): Section 3.1, pp. 44 to 45

	CERCLA DOCUMENT	GROSS-REFERENCE INDEX
CEOSURE PLAN COMPONENT	FINAL Laboratory Complex Implementation Plan, April 2002	Pilot Plant Warehouse - Bldg. 68 (33):
Removal of Waste and Contaminated Media     (Closure Guidance Item 3.6) - Continued	FINAL Laboratory Complex Implementation Flan, April 2002	Section 3.4, pp. 37 to 38
	FINAL Plant 1 Complex - Phase II Implementation Plan, August 2002	CP Warehouse - Building 56 (19): Section 3.3, pp. 35 to 37
· · · · · · · · · · · · · · · · · · ·		Plant 1 Pad Components (20):  TS-4: Section 3.5, pp. 39 to 40  TS-5: Section 3.6, pp. 41 to 42  TS-6: Section 3.7, pp. 42 to 43
	OU5 FINAL Sitewide Excavation Plan, July 1998	Excavation, Loading, Staging, Storage, Treatment and/or Disposition of Impacted Material: Section 2.0, Remediation Issues and General Strategies; Section 3.0, General Implementation Approach; Section 4.0, Location Specific Excavation Approaches; Appendix B, Sitewide Sequencing Plan; Appendix F.3 to F.5, Implementation of Construction; Appendix I, Sitewide Excavation of Contamination by Constituent
	OU5 Integrated Remedial Design Packages for Individual Remediation Areas:	Area/Phase-Specific Excavation, Loading, Staging, Storage, Treatment and/or Disposition of Impacted Material:
	Area 1, Phase II Supplemental Characterization Package, April 1999	Sludge Drying Beds (41):  Removal of Sludge: Section 3.3, Material Disposition Sampling Plan, pp. 3-3 to 3-4; Excavation of Soil: Section 5.0, Excavation, pp. 5-1 to 5-4
	FINAL Implementation Plan for Area 3A/4A, May 2001	Storage Pad North of Plant 6 (36): Section 3.2.2, Concrete, Asphalt Pads, Roadways and Floors, pp. 3-9 to 3-10; Section 3.3.3, HWMUs and USTs, p. 3-17; Section 3.3.4, General Excavation, pp. 3-17 to 3- 19
	FINAL Implementation Plan for Area 6 - Solid Waste Landfill and Fire Training Facility, March 2003	Fire Training Facility (1): Section 4.2, At- and Below-Grade Structure Demolition, pp. 4-5 to 4-6; Section 4.3, Soil Excavation, Monitoring and Segregation, pp. 4-6 to 4-10; Section 4.4, Impacted Material Management, pp. 4-10 to 4-12
	FINAL Implementation Plan for Area 3B/4B/5, February 2004	Drum Storage Area Near Lab Loading Dock (4), Drum Storage Area South of W-26 (5), Tank Farm Sump (11), Plant 8 East Pad (17), Plant 8 West Pad (18), Plant 1 Storage Pad (20), Abandoned Sump West of Pilot Plant (22):  Section 3.6.2, HWMUs and USTs, pp. 3-22 to 3-24; Section 3.7, Impacted Material Management, pp. 3-28 to 3-29

CROSS-REFERENCE INDEX FOR FCP HWMU CLOSURE PLAN COMPONENTS UNDER CERCLA		
CLOSURE PLAN COMPONENT <sup>1</sup>	CERCLA DOCUMENT	CROSS-REFERENCE INDEX
Removal of Waste and Contaminated Media     (Closure Guidance Item 3.6) - Continued	FINAL Excavation Plan for Area 6 Waste Pits and General Area, October 2005	Waste Pit 4 (27), Waste Pit 5 (42): Section 3.4.2, HWMUs and UTSs, pp. 3-6 to 3-7; Section 3.4.3.4, Waste Pit 4, pp. 3-8 to 3-9; Section 3.4.3.5, Waste Pit 5, p. 3-9
Schedule for Closure (Closure Guidance Item 3.7)	OU1 FINAL Remedial Action Work Plan, January 1997	Schedule Summary for Remedial Design/Remedial Action Packages; Closure of Waste Pit 4 (27), Waste Pit 5 (42): Table 2-1, p. 2-16
	OU3 FINAL Integrated Remedial Design/Remedial Action Work Plan, May 1997	Accelerated Schedule for Conducting Safe Shutdown Activities at D&D Complexes: Figure 6-1, p. 6-3
		Schedule for Submitting D&D Packages: Table 6-1, p. 6-7
	OU3 Implementation Plans for Above-Grade Decontamination and Dismantlement	Schedule for Removing & Decontaminating Above-Grade Unit Structures and Equipment:  To be Submitted for Each D&D Complex
	FINAL Plant 1 Complex – Phase I Implementation Plan, March 1996	Plant 1 Storage Bldg. – Bldg. 67 (25) Figure 4-1, p. 48
	FINAL Thorium/Plant 9 Complex Implementation Plan, August 1997	Plant 9 Warehouse Bldg. 81 (35) Figure 4-1, p. 43
	FINAL Misc. Small Structures Implementation Plan, October 1998	Waste Oil Decant Shelter (component of Trane Incinerator) (28); KC-2 Warehouse – Bldg. 63 (34); UNH Tanks – NFS Storage Area (46): Section 4.0, pp. 45 to 46
	FINAL Implementation Document for HWMUs #28 and #50, December 1998	Trane Incinerator (28); UNH Tanks – Raffinate Bldg. (50): Letter, J Reising to G. Jablonowski and T. Schneider, "Transmittal of RCRA/CERCLA Integrated Closure Implementation Document for the Trane Incinerator (HWMU No. 28) and UNH Tanks, Hot Raffinate Building (HWMU No. 50)," dated December 22, 1998
	FINAL Plant 6/East Warehouse Complex Implementation Plan, July 1999	Plant 6 Warehouse – Bldg. 79 (37): Figure 4-1, p. 42
	FINAL Multi-Complex Implementation Plan, October 2001	NAR System (10), Box Furnace (14), Oxidation Furnace #1 (15), Plant 8 Warehouse - Building 80 (29), UNH Tanks - North of Plant 2 (47), UNH Tanks - Southeast of Plant 2 (48), UNH Tanks - Digestion Area (49): Figure 4-1, p. 112
	FINAL Laboratory Complex Implementation Plan, April 2002	Pilot Plant Warehouse - Bldg. 68 (33): Section 4.0, p. 41

	DE INDEX FOR FOR HWMU CLOSURE PLAN COMPO	CROSS-REFERENCE INDEX
4. Schedule for Closure (Closure Guidance Item 3.7) - Continued	FINAL Plant 1 Complex - Phase II Implementation Plan, August 2002	CP Warehouse - Building 56 (19), TS-4, 5, and 6 (component of Plant 1 Pad) (20): Figure 4-1, p. 46
	OU5 FINAL Remedial Design Work Plan, August 1996	Schedule for Submitting Remedial Design Documents for Soil: Table 4-1, p. 4-6
	OU5 FINAL Sitewide Excavation Plan, July 1998	Schedule for Submitting Remedial Design Documents: Table 1-5
	OU5 Integrated Remedial Design Packages for Individual Remediation Areas	Area/Project-Specific Schedules:
	Area 1, Phase II Supplemental Characterization Package, April 1999	Sludge Drying Beds (41) — Sector 3D: Table 7-3
	FINAL Implementation Plan for Area 3A/4A, May 2001	Storage Pad North of Plant 6 (36) – Area 4A: Table 6-3
	FINAL Implementation Plan for Area 6 - Solid Waste Landfill and Fire Training Facility, March 2003	Fire Training Facility (1): Table 7-3
	FINAL Implementation Plan for Area 3B/4B/5, February 2004	Drum Storage Area Near Lab Loading Dock (4), Drum Storage Area South of W-26 (5), Tank Farm Sump (11), Plant 8 East Pad (17), Plant 8 West Pad (18), Plant 1 Storage Pad (20), Abandoned Sump West of Pilot Plant (22):  Table 6-3
5. Health and Safety Issues (Closure Guidance Item 3.9)	OU1 FINAL Remedial Action Documents Package, April 1999	Health and Safety Plan
	OU3 FINAL Integrated Remedial Design/Remedial Action Work Plan, May 1997	Health and Safety Plan: Appendix E
	OU5 FINAL Sitewide Excavation Plan, July 1998	Health and Safety Plan: Section 6.0, Project Health and Safety; Table 6-1, Occupational Monitoring and Action Levels
	OU5 Integrated Remedial Design Packages for Individual Remediation Areas	Area/Phase-Specific Health and Safety Requirements:
	Area 1, Phase II Integrated Remedial Design Package, September 1998	Sludge Drying Beds (41): Section 5.0, Project Specific Health and Safety
	FINAL Implementation Plan for Area 3A/4A, May 2001	Storage Pad North of Plant 6 (36): Section 5.0, Project Specific Health and Safety
	FINAL Implementation Plan for Area 6 - Solid Waste Landfill and Fire Training Facility, March 2003	Fire Training Facility (1): Section 6.0, Project-Specific Health and Safety
	·	

CROSS-REFERENCE INDEX FOR FCP HWMU CLOSURE PLAN COMPONENTS UNDER CERCLA		
GLOSURE PLAN COMPONENT	CERCLA DOCUMENT	CROSS-REFERENCE INDEX
Health and Safety Issues (Closure Guidance Item 3.9) - Continued	FINAL Implementation Plan for Area 3B/4B/5, February 2004	Drum Storage Area Near Lab Loading Dock (4), Drum Storage Area South of W-26 (5), Tank Farm Sump (11), Plant 8 East Pad (17), Plant 8 West Pad (18), Plant 1 Storage Pad (20), Abandoned Sump West of Pilot Plant (22):  Section 5.0, Project-Specific Health and Safety
Decontamination Efforts (Closure Guidance Item 3.10)	OU1 FINAL OU1 Complex Implementation Plan, September 2004	Decontamination and Demolition of Buildings and Equipment Used to Support OU1 Remedial Action (OU1 includes Waste Pits 4 (27) and 5 (42))
	OU3 FINAL Integrated Remedial Design/Remedial Action Work Plan, May 1997	HWMU Decontamination: Section 3.2.3, p. 3-13 HWMU Remediation: Section 3.5.3, pp. 3-69 to 3-73 (use of Safe Shutdown, D&D of Complexes)
·	OU3 Implementation Plans for Above-Grade Decontamination and Dismantlement	Decontamination of Above-Grade Unit Structures and Equipment; To be Submitted for Each D&D Complex
	FINAL Plant 1 Complex – Phase I Implementation Plan, March 1996	Plant 1 Storage Bldg. – Bldg. 67 (25): HWMU Decontamination: Section 3.7, pp. 42 to 45 Materials Management: Table 2-1, p. 12
	FINAL Thorium/Plant 9 Complex Implementation Plan, August 1997	Plant 9 Warehouse – Bldg. 81 (35): HWMU Decontamination: Section 3.13, pp. 39 to 40 Materials Management: Table 2-4, p. 12
	FINAL Misc. Small Structure Implementation Plan, October 1998	Waste Oil Decant Shelter (component of Trane Incinerator) (28): Section 3.17, pp. 36 to 37
		KC-2 Warehouse – Bldg. 63 (34) Section 3.23, pp. 42 to 43
		UNH Tanks – NFS Storage Area (46): Section 3.1, pp. 23 to 24
	FINAL Implementation Document for HWMUs #28 and #50, December 1998	Trane Incinerator (28): HWMU Decontamination
		UNH Tanks – Raffinate Bldg. (50): HWMU Decontamination
	FINAL Plant 6/East Warehouse Complex Implementation Plan, July 1999	Plant 6 Warehouse – Bldg. 79 (37): Section 3.9, p. 37

CLOSURE PLAN COMPONENT	CERCLA DOCUMENT	CROSS-REFERENCE INDEX
6. Decontamination Efforts (Closure Guidance	FINAL Multi-Complex Implementation Plan, October 2001	NAR System (10):
Item 3.10) - Continued		Section 3.1, pp. 40 to 41
		Box Furnace (14): Section 3.16, p. 76
		Oxidation Furnace #1 (15): Section 3.16, pp. 77 to 78
		Plant 8 Warehouse - Bldg. 80 (29): Section 3.38, p. 108
	44.4	UNH Tanks - North of Plant 2 (47): Section 3.1, pp. 42 to 43
		UNH Tanks - Southeast of Plant 2 (48): Section 3.23, pp. 87 to 88
		UNH Tanks - Digestion Area (49): Section 3.1, pp. 44 to 45
	FINAL Laboratory Complex Implementation Plan, April 2002	Pilot Plant Warehouse - Bldg.68 (33): Section 3.4, pp. 37 to 38
	FINAL Plant 1 Complex - Phase II Implementation Plan, August 2002	CP Warehouse - Building 56 (19): Section 3.3, p. 36
		Plant 1 Pad Components (20): TS-4: Section 3.5, p. 39
	OU5 FINAL Sitewide Excavation Plan, July 1998	Decontamination of Excavation Equipment: Section F.2.3, Installation of Decontamination and Wash Facilities
	OU5 Integrated Remedial Design Packages for Individual Remediation Areas	Area/Phase-Specific Requirements for Decontamination of Excavation Equipment:
	Area 1, Phase II Supplemental Characterization Package, April 1999	Sludge Drying Beds (41): Equipment Decontamination: Section 5.2, Loading and Hauling, pp. 5-2 to 5-3
	Area 1, Phase II Integrated Remedial Design Package, September 1998	Sludge Drying Beds (41): Remediation-Generated Water Management: Section 3.4.4, Remediation-Generated Wastewater Management, pp. 3-33 to 3-35
	FINAL Implementation Plan for Area 3A/4A, May 2001	Storage Pad North of Plant 6 (36): Appendix A, Section 5.6, Equipment and Personnel Monitoring Decontamination, pp. 13 to 14
	4. 7	
		8

	CERCLA DOCUMENT	CROSS-REFERENCE INDEX
6. Decontamination Efforts (Closure Guidance	FINAL Implementation Plan for Area 6 - Solid Waste Landfill and	Fire Training Facility (1):
Item 3.10) - Continued	Fire Training Facility, March 2003	Section 4.1.4, Support Facilities, pp. 4-2 to 4-3
	FINAL Implementation Plan for Area 3B/4B/5, February 2004	Drum Storage Area Near Lab Loading Dock (4), Drum Storage Area South of W-26 (5), Tank Farm Sump (11), Plant 8 East Pad (17), Plant 8 West Pad (18), Plant 1 Storage Pad (20),
		Abandoned Sump West of Pilot Plant (22): Section 3.4.3.5, Haul Routes, p. 3-15; Appendix A, Section 5.7, Equipment and Personnel Monitoring Decontamination, p. 14
	FINAL Excavation Plan for Area 6 Waste Pits and General Area, October 2005	Waste Pit 4 (27), Waste Pit 5 (42): Section 3.4.1, Above-WAC Excavations, p. 3-6; Section 3.3.5, Site Storm Water Treatment Capacity, pp. 3-4 to 3-5
7. Remediation Standards for Soils and Groundwater <sup>2</sup> (Closure Guidance Items 3.11, 3.11.1, 3.11.2, and 3.13)	OU1 FINAL Record of Decision, January 1995	Waste Pit (27, 42) Area: pp. 9-1 to 9-11 Tables B-5 to B-16
3.13)	OU1 Remedial Design Pre-Final Design Package II, March 1996	Waste Pit (27, 42) Area: pp. A-3 to A-7
	OU5 FINAL Record of Decision, January 1996	Final Remediation Levels (FRLs) for Soil and Groundwater: Table 9-3, p. 9-23 Table 9-4, p. 9-26
	OU5 FINAL Sitewide Excavation Plan, July 1998	Summary of Contaminant Levels Pertinent to Soil Remediation at the FCP: Table 1-4; Final Remediation Levels: Section 2.1.3, p. 2-10; Constituents of Ecological Concern: Section 2.1.4, p. 2-13; Preliminary Identification of Primary, Secondary COCs and Ecological COCs Assigned to Remediation Areas: Table 2-7
	OU5 Integrated Remedial Design Packages for Individual Remediation Areas	Area/Phase-Specific FRLs:
	Area 1, Phase II Supplemental Characterization Package, April 1999	Sludge Drying Beds (41): Section 3.3, Material Disposition Sampling Plan, pp. 3-3 to 3-4; Section 5.1, Excavation and Monitoring, pp. 5-1 to 5-2
	FINAL Implementation Plan for Area 3A/4A, May 2001	Storage Pad North of Plant 6 (36): Soil Final Remediation Levels for HWMUs and USTs, Table 2-6
	FINAL Implementation Plan for Area 6 - Solid Waste Landfill and Fire Training Facility, March 2003	Fire Training Facility (1): Soil Final Remediation Levels, Table 3-3

CROSS-REFERENCE INDEX FOR FCP HWMU CLOSURE PLAN COMPONENTS UNDER CERCLA		
CLOSURE PLAN COMPONENT <sup>1</sup>	CERCLA DOCUMENT	CROSS-REFERENCE INDEX
7. Remediation Standards for Soils and Groundwater <sup>2</sup> (Closure Guidance Items 3.11, 3.11.1, 3.11.2, and 3.13) - Continued	FINAL Implementation Plan for Area 3B/4B/5, February 2004	Drum Storage Area Near Lab Loading Dock (4), Drum Storage Area South of W-26 (5), Tank Farm Sump (11), Plant 8 East Pad (17), Plant 8 West Pad (18), Plant 1 Storage Pad (20), Abandoned Sump West of Pilot Plant (22):  Soil Final Remediation Levels, Table 2-3
	FINAL Excavation Plan for Area 6 Waste Pits and General Area, October 2005	Waste Pit 4 (27), Waste Pit 5 (42): Table 2-3, p. 2-17
Sampling Plan and Analytical Procedures (Closure Guidance Item 3.14) – Includes Sampling to Define the Extent of Contamination and Sampling to Verify the Unit is Clean	OU1 FINAL Remedial Investigation Report, August 1994	Procedures for Determining Nature and Extent of Contamination at Waste Pit Area:  Waste Pit 4 (27), Waste Pit 5 (42): Chapter 2, pp. 2-1 to 2-161
the Officis Clean	OU1 FINAL Remedial Action Documents Package, April 1999	Procedures for Sampling and Analysis of Waste Pit Area; Certification of Waste Pit Area Cleanup: Sampling and Analysis Plan
·	OU5 FINAL Remedial Investigation Report, March 1995	Procedures for Determining Nature and Extent of Soil Contamination: Chapter 2, pp. 2-1 to 2-83
	OU5 FINAL Sitewide Excavation Plan, July 1998	Procedures for Certifying Attainment of Soil Cleanup: Section 2.2.2, p. 2-18 to 2-19; Section 2.2.5, p. 2-22 to 2-23; Section 3.4, p.3-22 to 3-23; Appendix G, Certification Design Rationale
	OU5 Integrated Remedial Design Packages (IRDPs) for Individual Remediation Areas	Area/Phase-Specific Procedures for Certifying FRL Attainment:
	Area 1, Phase II Supplemental Characterization Package, August 1998	Sludge Drying Beds (41): Section 3.3, Material Disposition Sampling Plan, p. 3-3; Section 5.0, Excavation Monitoring, pp. 5-1 to 5-2
	FINAL Implementation Plan for Area 3A/4A, May 2001	Storage Pad North of Plant 6 (36): Section 2.3.2.3, Location of HWMUs and USTs, p. 2-12; Section 3.3.3, HWMUs and USTs, p. 3-17; Section 3.3.4, General Excavation, pp. 3-17 to 3-19
	FINAL Implementation Plan for Area 6 - Solid Waste Landfill and Fire Training Facility, March 2003	Fire Training Facility (1): Section 3.6, Excavation Boundaries, p. 3-10; Section 4.6, Precertification and Interim Grading, p. 4-13
	FINAL Implementation Plan for Area 3B/4B/5, February 2004	Drum Storage Area Near Lab Loading Dock (4), Drum Storage Area South of W-26 (5), Tank Farm Sump (11), Plant 8 East Pad (17), Plant 8 West Pad (18), Plant 1 Storage Pad (20), Abandoned Sump West of Pilot Plant (22):  Section 2.6, Excavation Boundaries, pp. 2-20 to 2-27; Section 3.9, Precertification And Interim Grading, p. 3-31

CROSS-REFERENCE INDEX FOR FCP HWMU CLOSURE PLAN COMPONENTS UNDER CERCLA		
CLOSURE PLAN COMPONENT	CERCLA DOCUMENT	CROSS-REFERENCE INDEX
<ol> <li>Sampling Plan and Analytical Procedures (Closure Guidance Item 3.14) – Includes Sampling to Define the Extent of Contamination and Sampling to Verify</li> </ol>	FINAL Excavation Plan for Area 6 Waste Pits and General Area, October 2005	Waste Pit 4 (27), Waste Pit 5 (42): Section 2.0, Predesign Investigations and Characterization Data; Section 3.8, Precertification, p. 3-16
the Unit is Clean - Continued	OU5 Certification Design Letters for Individual Remediation Areas	Area/Phase-Specific Procedures for Certifying FRL Attainment:
	FINAL Certification Design Letter for Area 1, Phase II, October 1999	Sludge Drying Beds (41): Section 4.1, Certification Design, pp. 4-1 to 4-5; Section 4.3, Sampling, pp. 4-6 to 4-7
	FINAL Certification Design Letter for Area 6, Phase I, May 2003	Fire Training Facility (1): Section 4.0, Certification Approach, pp. 4-1 to 4-3
	FINAL Certification Design Letter for Area 3A and Area 3B, August 2004  FINAL Certification Design Letter and Certification Project Specific Plan for Area 4B – Part One (Revision 1), September 2005	Plant 1 Pad (20): Section 4.0, Certification Approach, pp. 4-1 to 4-6 Drum Storage Area Near Lab Loading Dock (4), Plant 8 West Pad (18), Trane Incinerator (28), UNH Tanks – NFS Storage Area (46), UNH Tanks – North of Plant 2 (47), UNH Tanks – Digestion Area (49), UNH Tanks – Raffinate Building (50):
		Section 3.0, Area-Specific Constituents of Concern, pp. 3-1 to 3-8; Section 4.0, Certification Approach, pp. 4-1 to 4-10
	FINAL Area 4B Part 2 and Main Drainage Corridors (1st Street) Certification Design letter and Certification Project Specific Plan	Drum Storage Area South of W-26 (5), Abandoned Sump West of Pilot Plant (22)
		Section 3.0, Area-Specific Constituents of Concern, pp. 3-1 to 3-6; Section 4.0, Certification Approach, pp. 4-1 to 4-6
	FINAL Certification Design Letter and Certification Project Specific Plan for Area 6 Waste Pits 4, 5, and 6, January 2006	Waste Pit 4 (27), Waste Pit 5 (42):
		Section 3.0, Area-Specific Constituents of Concern, pp. 3-1 to 3-7; Section 4.0, Certification Approach, pp. 4-1 to 4-10
	FINAL Certification Design Letter and Certification Project Specific Plan for Area 6 Former Production Area and Main	Plant 8 East Drum Storage Pad (17), Storage Pad North of Plant 6 (36), Uranyl Nitrate Tanks – Southeast of Plant 2 (48):
	Drainage Corridor Area, January 2006	Section 3.0, Area-Specific Constituents of Concern, pp. 3-1 to 3-12; Section 4.0, Certification Approach, pp. 4-1 to 4-15
Description of Removal Efforts and     Treatment Processes (Closure Guidance     Item 3.15)	OU1 FINAL Remedial Design Documents Package, August 1998	Removal and Handling of Waste Pit Waste – Waste Pit 4 (27), Waste Pit 5 (42): Volume 2, Excavation Plan

CROSS-REFERENCE CROSS-REFERENC	CERCLA DOCUMENT	CROSS-REFERENCE INDEX
Description of Removal Efforts and	OU1 FINAL Remedial Action Documents Package, April 1999	Processing of Waste Pit Waste – Waste Pit 4 (27), Waste Pit 5 (42):
Treatment Processes (Closure Guidance Item 3.15) - Continued	Contract Con	Operations and Maintenance (O & M) Plan for Remediation Facilities
		u .
	OU3 Implementation Plans for Above-Grade Decontamination and Dismantlement	Removal and Treatment of Waste in HWMU:  To be Submitted for Each D&D Complex (where applicable)
	OU5 FINAL Feasibility Study Report, June 1995	Evaluation of Technologies and Process Options: Section 3.3, p. 3-5
	OU5 FINAL Sitewide Excavation Plan, July 1998	Excavation, Loading, Staging, Storage, Treatment, and/or Disposition of Impacted Material: Section 2.0, Remediation Issues and General Strategies; Section 3.0, General Implementation Approach; Section 4.0, Location Specific Excavation Approaches; Appendix B, Sitewide Sequencing Plan; Appendix F, Implementation of Construction; Appendix I, Sitewide Extent of Contamination by Constituent
	OU5 Integrated Remedial Design Packages (IRDPs) for Individual Remediation Areas	Area/Phase-Specific Excavation, Loading, Staging, Storage, Treatment, and/or Disposition of Impacted Material:
	Area 1, Phase II Supplemental Characterization Package, April 1999	Sludge Drying Beds (41):  Management of Sludge: Section 3.3, Material Disposition Sampling Plan, p. 3-3; Management of Soil: Section 5.0, Excavation, pp. 5-1 to 5-4
	FINAL Implementation Plan for Area 3A/4A, May 2001	Storage Pad North of Plant 6 (36): Section 3.2.2, Concrete, Asphalt Pads, Roadways and Floors, pp. 3-9 to 3-10; Section 3.3.3, HWMUs and USTs, p. 3-17; Section 3.3.4, General Excavation, pp. 3-17 to 3-19
	FINAL Implementation Plan for Area 6 - Solid Waste Landfill and Fire Training Facility, March 2003	Fire Training Facility (1): Section 4.2, At- and Below-Grade Structure Demolition, pp. 4-5 to 4-6; Section 4.3, Soil Excavation, Monitoring and Segregation, pp. 4-6 to 4-10; Section 4.4, Impacted Material Management, pp. 4-10 to 4-12
	FINAL Implementation Plan for Area 3B/4B/5, February 2004	Drum Storage Area Near Lab Loading Dock (4), Drum Storage Area South of W-26 (5), Tank Farm Sump (11), Plant 8 East Pad (17), Plant 8 West Pad (18), Plant 1 Storage Pad (20), Abandoned Sump West of Pilot Plant (22):  Section 3.6.2, HWMUs and USTs, pp. 3-22 to 3-24; Section 3.7, Impacted Material Management, pp. 3-28 to 3-29

	CERCLA DOCUMENT	CROSS-REFERENCE INDEX
9. Description of Removal Efforts and Treatment Processes (Closure Guidance Them 2.45). Continued.	FINAL Excavation Plan for Area 6 Waste Pits and General Area, October 2005	Waste Pit 4 (27), Waste Pit 5 (42): Section 3.4, Remedial Excavation, pp. 3-5 to 3-9
Item 3.15) – Continued	OU1 FINAL Record of Decision, January 1995	ARARs: Relevant and Appropriate as some remedial alternatives may require closure to these standards Tables B-28 and B-29
	OU1 FINAL Remedial Design Work Plan, June 1995	Revised ARARs: Tables A-24 and A-25
10. Landfill Closure Requirements – (if applicable) <sup>3</sup> - (Closure Guidance Item 3.16)	OU5 FINAL Record of Decision, January 1996	Not Applicable, if Remediation Levels for Soil and Groundwater are Sufficient for a Clean Hazardous Waste Management Unit Closure <sup>1</sup> :  ARARs: Table B-3, p. B.3-10
	OU5 Integrated Remedial Design Packages for Individual Remediation Areas	Area/Phase-Specific Landfill Closure Requirements:
	Area 1, Phase II Integrated Remedial Design Package, September 1998	Sludge Drying Beds (41): Included within Appendix A, Design Criteria Package, Table A-2, p. A-32, but not anticipated to be applicable since HWMU to be clean (risk-based) closed by removal.
	FINAL Implementation Plan for Area 3A/4A, May 2001	Storage Pad North of Plant 6 (36): Included within Appendix A, Design Criteria Package, Table A-2, pp. A-69 to A-74, but not anticipated to be applicable since HWMU to be clean (risk-based) closed by removal.
	FINAL Implementation Plan for Area 6 - Solid Waste Landfill and Fire Training Facility, March 2003	Fire Training Facility (1): Included within Appendix A, Design Criteria Package, Table A-2, pp. A-69 to A-74, But not anticipated to be applicable since HWMU to be clean (risk-based) closed by Removal
	FINAL Implementation Plan for Area 3B/4B/5, February 2004	Drum Storage Area Near Lab Loading Dock (4), Drum Storage Area South of W-26 (5), Tank Farm Sump (11), Plant 8 East Pad (17), Plant 8 West Pad (18), Plant 1 Storage Pad (20), Abandoned Sump West of Pilot Plant (22):
		Included within Appendix A, Design Criteria Package, Table A-2, pp. A-69 to A-74, But not anticipated to be applicable since HWMUs are to be clean (risk-based) closed by Removal
11. Certification (Closure Guidance Item 3.18)	OU1 Final Remedial Action Report, August 2006	Summary of HWMU Remediation Activities/Certification Sampling
		Results: Waste Pit 4 (27), Waste Pit 5 (42): Section 3.0 Construction Activities; Section 4.0 Chronology of Events; Section 5.0 Performance Standards and Construction Quality Control; Section 6.0 Final Inspection and Certification; Appendix B Schematic of Treatment Systems
		(Certification sampling of underlying soils to be addressed in the Operable Unit 5 Interim Remedial Action Report)

CLOSURE PLAN COMPONENT	CERCLA DOCUMENT	CROSS-REFERENCE INDEX
11. Certification (Closure Guidance Item 3.18) - Continued	OU1 FINAL Operable Unit 1 Complex Project Completion Report, October 2005	Summary of D&D Activities Completed for Buildings and Equipment Used to Support OU1 Remedial Action (OU1 includes Waste Pits 4 (27) and 5 (42))
	OU3 Project Completion Reports	Summary of HWMU Remediation Activities: To be Submitted for Each D&D Complex
	FINAL Plant 1 Complex – Phase 1 Project Completion Report, December 1997 FINAL Thorium/Plant 9 Complex Project Completion Report, April 1999	Plant 1 Storage Bldg. – Bldg. 67 (25):
	FINAL Project Completion Report for the Decontamination of HWMU No. 50 – UNH Tanks, Hot Raffinate Building and HWMU No. 28 – Trane Incinerator, May 1999	Trane Incinerator (28); UNH Tanks – Raffinate Building (50)
	FINAL Miscellaneous Small Structures Decontamination and Dismantlement Project, Task Order #432 Completion Report, October 1999	Waste Oil Decant Shelter (component of Trane Incinerator) (28): Section 2.3, pp. 3 to 5
•	October 1999	KC-2 Warehouse – Bldg. 63 (34) Section 2.4, pp. 5 to 6
	FINAL Miscellaneous Small Structures Decontamination and Dismantlement Project, Task Order #464 Completion Report, December 2000	UNH Tanks - NFS Storage Area (46): Section 2.0, p. 1, Component-Specific Remediation Summary; Section 2.5, HWMU No. 46 Decontamination, p. 4
	FINAL Plant 1 Complex – Phase II Project Completion Report, November 2003	CP Warehouse - Building 56 (19): Section 2.2.4, pp. 5 to 6
		Plant 1 Pad Components (20):     TS-4: Section 2.2.6, pp. 6 to 7     TS-5: Section 2.2.7, p. 7     TS-6: Section 2.2.8, pp. 7 to 8
		Section 3.0, Material Management, pp. 8 to 9
	FINAL Laboratory Complex Project Completion Report, July 2004	Pilot Plant Warehouse (33): Section 2.2.4, pp. 6 to 7
	FINAL Multi-Complex Project Completion Report, July 2004	NAR System (10), Box Furnace (14), Oxidation Furnace #1 (15), Plant 8 Warehouse - Bldg. 80 (29), UNH Tanks - North of Plant 2 (47), UNH Tanks - Southeast of Plant 2 (48), UNH Tanks - Digestion Area (49): Section 3.0, HWMU Closure Tasks, pp. 24 to 35
	FINAL Pilot Plant Complex Project Completion Report, September 2004	Tank T-2 (54): Section 3.0, HWMU Closure Tasks, p. 9
	FINAL East Warehouse Complex Project Completion Report, July 2005	Plant 6 Warehouse (37): Section 3.0, HWMU Closure Tasks, pp. 5 to 6

	GERCLA DOGUMENT	CROSS-REFERENCE INDEX
CLOSURE PLAN COMPONENT <sup>3</sup> 11. Certification (Closure Guidance Item 3.18) - Continued	OU3 Final Remedial Action Report	Summary of HWMU Remediation Activities/Certification Sampling Results Associated with OU3 Above Grade Units.
		NAR System (10), Box Furnace (14), Oxidation Furnace #1 (15), Building 56 (19), Plant 1 Storage Building (25), Plant 8 Warehouse (29), Pilot Plant Warehouse (33), KC-2 Warehouse (34), Plant 9 Warehouse (35), Plant 6 Warehouse (37), Thorium Nikate Tank T2
	. *	(54) Section 3.0 Construction Activities, Section 4.0 Chronology
		of Events: Section 5.0 Performance Standards and Construction Quality Control: Section 6.0 Final Inspection and Certification: Appendix C.HWMU-Closures
		(Certification sampling of underlying soils to be addressed in the Operable Unit-5 Interim Remedial Action Report)
	OU5 Certification Reports for Individual Remediation Areas:	Area/Phase-Specific Certification Reports (Summary of Remedial Activities/Certification Sampling Results):
	FINAL Certification Report for Area 1, Phase II, October 2000	Sludge Drying Beds (41): Section 2.1.5,3, Sector 3 Certification Units, pp. 2-9 to 2-11; Section 2.3, Statistical Analysis, pp. 2-12 to 2-13; Section 3.1, Excavation Activities, p. 3-1; Section 3.2, Changes to Scope of Work, pp. 3-3 to 3-5; Section 5.2, Sludge Drying Bed HWMU Closure, p. 5-3
	FINAL Certification Report for Area 6, Phase I – Part 2, March 2004	Fire Training Facility (1): Section 2.2, Certification Approach; Section 3.0, Overview of Field Activities; Section 4.0, Analytical Methodologies, Data Validation Processes and Data Reduction; Section 5.0, Certification Evaluation and Conclusions
*	FINAL Certification Report for Area 3A and Area 3B, February 2005	Plant 1 Pad (20): Section 2.0, Certification Approach, pp. 2-1 to 2-14; Section 3.1.2, Overview of Field Activities – Area 3B, pp. 3-3 to3-4; Section 4.0, Analytical Methodologies, Data Validation Processes and Data Reduction, pp. 4-1 to 4-6; Section 5.1.2, Certification Results and Evaluation – A3B-HWMU 20, pp. 5-9 to
		5-10; Section 5.2, Areas 3A and 3B Certification Conclusions, p. 5-10
	FINAL Certification Report for Area 4B – Part One, January 2006	Drum Storage Area Near Lab Loading Dock (4), Plant 8 West Pad (18), Trane Incinerator (28), UNH Tanks – NFS Storage Area (46), UNH Tanks – North of Plant 2 (47), UNH Tanks – Digestion Area (49), UNH Tanks – Raffinate Building (50):  Section 2.0, Certification Approach; Section 3.0, Overview of Field Activities; Section 4.0, Analytical Methodologies, Data Validation Processes and Data Reduction; Section 5.0, Certification Evaluation and Conclusions

CLOSURE PLAN COMPONENT	CERCLA DOCUMENT	CROSS-REFERENCE INDEX
11. Certification (Closure Guidance Item 3.18) -	FINAL Certification Report for Area 6 Waste Pits 4, 5, and 6, April 2006	Waste Pit 4 (27), Waste Pit 5 (42):
Continued		Section 2.0, Certification Approach; Section 3.0, Overview of Field Activities; Section 4.0, Analytical Methodologies, Data
The state of the s		Validation Processes and Data Reduction; Section 5.0,
	* *	Certification Evaluation and Conclusions
٥	FINAL Certification Report for Area 6 Former Production Area and Main Drainage Corridor Area, March 2006	Tank Farm Sump (11), Storage Pad North of Plant 6 (36), UNH Tanks (48): Section 2.0, Certification Approach; Section 3.0, Overview of
		Field Activities; Section 4.0, Analytical Methodologies, Data Validation Processes and Data Reduction; Section 5.0, Certification Evaluation and Conclusions
	FINAL Certification Report for Area 4B Part 2 – Main Drainage Corridor (First Street), October 2006	Drum Storage Area South of W-26 (5), Abandoned Sump West of Pilot Plant (22):
		Section 2.0, Certification Approach; Section 3.0, Overview of Field Activities; Section 4.0, Analytical Methodologies, Data Validation Processes and Data Reduction; Section 5.0, Certification Evaluation and Conclusions
	OU5 Interim Remedial Action Report	Certification of Conformance with Requirements and Standards:  To be Submitted
12. Status of Facility (or Unit) After Closure (Closure Guidance Item 3.19)	OU1 FINAL Record of Decision, January 1995	Status of Waste Pits After OU1 Remedial Action: pp. 10-1 to 10-9
	OU3 FINAL Record of Decision for Interim Remedial Action, June 1994	Status of Production Area HWMUs After OU3 Remedial Action: Section 5.4, p. 11
	OU3 Final Record of Decision for Final Remedial Action, September 1996	Integration of the Interim and Final Remedial Actions, Section 2.1, p. 9
	OU5 FINAL Record of Decision, January 1996	Status of FCP After Soil and Groundwater Remediation: Section 4.0, p. 4-1
	OU5 FINAL Sitewide Excavation Plan, July 1998	Certification Reports: Section 7.4, pp. 7-10 to 7-14
	OU5 Certification Reports for Individual Remediation Areas	Status of those HWMUs That Had Soil Contamination After Soil Remedial Action: To be Submitted (if required)

<sup>&</sup>lt;sup>1</sup> Closure Guidance Items are from the Closure Plan Review Guidance for RCRA Facilities, Ohio EPA, March 1999.

<sup>&</sup>lt;sup>2</sup> The perched water contamination has many sources, only some of which are the HWMUs. Because of this, it is difficult or impossible to identify the degree to which a HWMU may have contributed to perched water contamination. Therefore, the nature and extent of contamination in the perched water, and the most appropriate remedial action method and objectives, are best achieved under the CERCLA process alone.

Ohio EPA has two options for clean closure where there are no more RCRA requirements (i.e., no post-closure requirements) for the existing HWMUs: (1) complete removal of waste and impacted environmental media, and (2) complete removal of waste and impacted environmental media to health-based standards (known at the FCP as Final Remediation Levels, FRLs). Post closure requirements will, however, be applicable to the CERCLA on-property disposal cell as it will take some soil and debris contaminated with RCRA-hazardous waste [see Post Closure Care and Inspection Plan, On-Site Disposal Facility (20100-PL-010, Rev. 1, July 1997)].